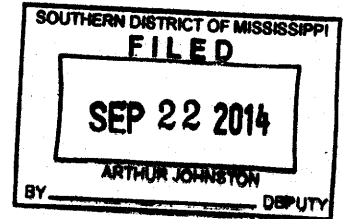


U.S. Southern District
Federal Court

Robert P. Guillory
Petitioner

No. 2:14cv156-KS-MTP

Vs.



Jones County Jail, Sheriff Alex Hodge,
Major Randy Johnson, Captain David Hare,
Sgt. Johnathan Carter, Sgt. Howard and
Sgt. Piles and John Does 1-10 in their
individual and official capacity
Respondent

Claim

I, Robert P. Guillory files this claim as a "1983" federal suit and I am without funds to pay cost and file this claim pro-se and ask the court to construe my filing. Petitioner claims the Jones County Adult Detention staff above has and continues to violate my rights, constitutional rights, my amendment rights including my 4th, 5th, 6th and 8th amendments, they are also violating due process of their own policy and procedures and shows deliberate indifference, excessive force and abuse of authority as a result. I have and still am suffering mental and physical injuries.

I.

As the petitioner, I have filed and written numerous

complaints to cover the Clinton Act of grievance procedure, however no relief or no remedy was given and to no avail was a response recieved. The petitioner was charged with a rule violation from the Jones County Adult Detention Facility Inmate Handbook; (Exhibit A). The inmate handbook states policies and procedures that are not being followed by the staff and administration, such as classification and disciplinary. The jail puts it's policy and procedure for public and inmate viewing, that they have a committee or classification for a disciplinary procedure, however the jail does not have a committee nor do they write disciplinary reports as their handbook says. The jail violated my right to due process when Sgt. Carter wrote a disciplinary report, acting as the reporter and then sentencing me to 60 days of solitary confinement, (See Exhibit B) and then acting as the committee. I never recieved a disciplinary report, or the right to appeal the imposed restriction. There was never a hearing, witnesses were never called but I do have the witnesses declarations to the incident. Exhibit C states that solitary or disciplinary confinement will only be imposed under the following due process requirements, which hasn't been met. Instead, I've been locked in a cell used for drunks, insane or high jail intakes and they do this for punishment. This cell has no bed, no toilet, only a grate in the floor for urinating in. Its a violation to make a rule and not abide by it. Federal courts ruled against group or corporal punishment, however in Exhibit C, Jones County Adult Detention Facility does believe and supports group punishment. Furthermore, I never seen a committee

in order to appeal their decision.

II.

This jail is overcrowded and during my disciplinary or solitary confinement, I am being tripled celled with inmates in a cell designed for one inmate, with denial of all recreation (Exhibit B), no out of cell recreation, yard or dayroom. This is causing me mental and physical injuries, muscle fatigue and constipation, with poor ventilation and I'm forced to sleep on the floor. While being housed on lock-down with mental patients and drunks who beat and scream all night and all day, the lights on 24 hours a day while being on lock-down 24 hours a day. Federal courts ruled that maximum lock down a certain cubic feet of housing must be allowed one hour each day out of cell ~~recreation~~ recreation. This is being a cruel and unusual punishment to me. I written the captain of the jail about this and was denied. See Exhibit "D". I have asked officers and their Sgts. but they too have denied me.

III.

Since petitioners solitary confinement, I have been awoken from sleep due to mace being sprayed on other people by Sgt. Howard. She continues to use excessive force on inmates since Aug. 14, at or around 9:00 pm on inmate James Sullivan, Sept 3, 2014 Sgt. Howard sprayed Chris Logan at or around 10:35 pm. and then pointer both her middle fingers in the air to everyone. Sept. 5th 2014 at or around 10:45 Sgt. Howard again sprayed mace in cell 120. Everyone in solitary confinement is forced

to smell this mace. Being threaten by dogs now and forced to lay on the floors. Jones County Sheriffs are being called in now and bringing their dogs with them. One inmate was ~~bitten~~ already by a dog when captain Hare and Sgt. Piles shift came into the jail Sept. 9 2014, at or around 2:00pm. One officer was bitten while messing with the inmates, in cell 110. Quintin George was actually bitten by one of the dogs that ~~day~~ as well.

Witnesses to my complaint who suffers as I do, who will testify all my allegation by ~~sides~~ the video tape which records all actions here in Jones County Adult Detention Facility:

Greg Hancock, Daniel Freeman, Kelvin Nixon, John Lowe, Jeffery Smith, Jeffery Love, Nicholas Craven, Julius Wilson, Andy Funck and Charles English.

Relief Sought

Petitioner seeks monetary damages for pain and suffering, mental and physical injuries for the sum of maximum coverage per defendant covered by the jail and \$100,000⁰⁰ each in their individual capacity with the court ruling the jail to follow and abide by their policy.

I swear under the penalty of perjury that the above is true.

Sincerely,

Robert P. Sullivan
459-29-8167

Request for evidentiary hearing
Request for legal assistance, lawyer